

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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ANGELA ROBERTS,

Plaintiff,

v.

UNLOCK PARTNERSHIP SOLUTIONS AOI  
INC.; CLEAR EDGE TITLE INC.; ABC  
INC. 1-10, AND JOHN DOE 1-10,  
Defendants.

Case No. 1:24-cv-01374-CPO-AMD

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**ANSWER TO PLAINTIFF'S SECOND AMENDED COMPLAINT WITH**

**AFFIRMATIVE DEFENSES AND CROSSCLAIMS**

Clear Edge Title Inc. (hereinafter "CETI" or "Responding Defendant"), by way of answer to Plaintiff's First Amended Complaint says:

**INTRODUCTION**

Neither admitted nor denied. Responding Defendant leaves Plaintiff to her proofs.

**JURISDICTION AND VENUE**

1. Admitted.

**PARTIES**

2. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

3. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

4. Admitted.

5. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

**ALLEGATIONS**

A. *In a moment of financial desperation, Ms. Roberts is locked into Unlock's product. - Denied.*

6. Admitted in part, denied in part. By way of further response, it is admitted only that Plaintiff purchased the property located at 48 Buckeye Lane, Willingboro, NJ in 2015. Responding Defendant does not have sufficient knowledge to either admit or deny the remaining allegations of this paragraph and therefore leaves Plaintiff to her proofs.

7. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

8. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

9. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

10. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

11. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

12. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

13. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

14. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

15. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

16. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

17. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

18. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

19. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff's to his proofs.

20. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

21. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

22. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

23. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

24. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

25. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

26. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

27. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

28. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

29. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

30. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

31. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

32. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

33. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

34. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

35. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

36. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

*B. Federal and state laws protect homeowners from complex and confusing mortgage products like Unlock's that threaten to take people's houses. - Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.*

37. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 37 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

38. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 38 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

39. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 39 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

40. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 40 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

41. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 41 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

42. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 42 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

43. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 43 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

44. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 44 of the Plaintiff's Complaint contain conclusions of law to which no response is

required. To the extent that a response is deemed to be required, these allegations are specifically denied.

45. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 45 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

46. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 46 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

*C. Unlock incorrectly claims that it does not need to comply with any of these laws. - Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.*

47. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

48. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 48 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.



49. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

50. Neither admitted nor denied. By way of further response, the allegations contained in Paragraph 50 of the Plaintiff's Complaint contain conclusions of law to which no response is required. To the extent that a response is deemed to be required, these allegations are specifically denied.

51. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

52. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

53. (a) through (e). Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

54. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

55. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

56. Neither admitted nor denied. By way of further response, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

57. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

58. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

59. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

60. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

61. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

62. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

63. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

64. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

65. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

66. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

67. Neither admitted nor denied. By way of further response, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

68. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

69. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

70. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

71. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

72. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

73. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

74. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

D. *Despite its best efforts to portray its product as not a loan, Unlock's own documentation refers to it as a mortgage loan.*  
**- Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.**

75. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

76. Neither admitted nor denied. By way of further response, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

77. Neither admitted nor denied. By way of further response, the contents of this paragraph constitute a conclusion of law to which no response is required. To the extent that a response is deemed to be required, the allegations are specifically denied.

78. Neither admitted nor denied. By way of further response, the contents of this paragraph constitute a conclusion of law to which no response is required. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

79. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

80. Admitted in part, denied in part. By way of further response, it is admitted only that Responding Defendant prepared a title search. All other characterizations are specifically denied.

81. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

82. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

*E. Unlock tries to prevent homeowners like Ms. Roberts from vindicating their rights in court. - Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.*

83. Neither admitted nor denied. By way of further response, the allegations contained in this paragraph constitute conclusions of law to which no response is required. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

84. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

85. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

86. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

87. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

88. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations references several documents the terms of which speak for themselves and to the extent the documents are mischaracterized the allegations are denied.

89. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

90. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

91. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

92. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

93. Neither admitted nor denied. By way of further response, the allegations raised in this paragraph constitute conclusions of law to which no response is required. To the extent that a response is deemed to be required, the allegations are specifically denied.

*F. Unlock's predatory business practices have allowed the company to expand rapidly. - Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.*

94. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.



95. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

96. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

97. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

98. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

**COUNT 1** (Unlock)  
**TRUTH IN LENDING ACT**

99. Responding Defendant repeats and realleges its responses to the allegations set forth in the previous paragraphs as if set forth at length herein.

100. Neither admitted nor denied. By way of further response, the allegations reference a document the terms of which speak for themselves and to the extent the document is mischaracterized the allegations are denied.

101. Neither admitted nor denied. By way of further response, the allegations set forth in this paragraph constitute conclusions of law to which no response is required. Moreover, they are not directed to Responding Defendant. Additionally, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Finally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

102. Neither admitted nor denied. By way of further response, the allegations set forth in this paragraph constitute conclusions of law to which no response is required. Moreover, the allegations set forth in this paragraph are not directed to Responding Defendant. Additionally, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

Finally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

103. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Moreover, the allegations constitute a conclusion of law for which no response is required.

104. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

105. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover,, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Finally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

106. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

107. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Additionally, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Finally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

108. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Additionally, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Finally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

109. (a) through (d). The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute and or its implementing regulation the terms of which

speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

110. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations constitute a conclusion of law to which no response is required.

111. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations constitute a conclusion of law to which no response is required.

112. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the

allegations constitute a conclusion of law, to which no response is required.

113. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

114. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations constitute conclusions of law to which no response is required.

115. (a) through (f). The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference Statute(s) and/or their implementing regulations, the terms of which speak for themselves and to the extent the Statute and/or regulation is mischaracterized the allegations are denied.

116. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations constitute a conclusion of law to which no response is required.

117. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute conclusions of law to which no response is required.

118. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute and documents the terms of which speak for themselves and to the extent the

Statute and documents are mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

119. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Additionally, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

**WHEREFORE**, Responding Defendant, Clear Edge Title Inc., demands judgment:

- a) Dismissing the Complaint with prejudice;
- b) For court costs; and
- c) Such other relief as the Court deems appropriate.

**COUNT 2 (Unlock)**  
**NEW JERSEY OWNERSHIP SECURITY ACT OF 2002**

120. Responding Defendant repeats and realleges the responses to the allegations set forth in the previous paragraphs as if set forth at length herein.

121. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is



mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

122. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Additionally, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

123. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

124. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute the terms of

which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

125. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

126. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

127. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Additionally, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

**WHEREFORE,** Responding Defendant, Clear Edge Title Inc., demands judgment:

- a) Dismissing the Complaint with prejudice;
- b) For court costs; and
- c) Such other relief as the Court deems appropriate.

**COUNT 3** (All Defendants)  
**NEW JERSEY CONSUMER FRAUD ACT**

128. Responding Defendant repeats and realleges the responses to the allegations set forth in the previous paragraphs as if set forth at length herein.

129. The allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

130. Neither admitted nor denied. By way of further response, the allegations constitute conclusions of law to which no response is required.

131. Neither admitted nor denied. By way of further response, the allegations constitute conclusions of law to which no response is required.

132. The allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

133. The allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied.

134. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations constitute a conclusion of law to which no response is required.

135. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations constitute a conclusion of law to which no response is required.

136. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in

this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations constitute a conclusion of law to which no response is required.

137. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations constitute a conclusion of law to which no response is required.

138. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

139. Denied. By way of further response, it is specifically denied that Responding Defendant violated any section or subsection of any statute, including but not limited to the referenced New Jersey Residential Mortgage Lending Act. Moreover,

the referenced statute does not apply to Responding Defendant.  
Responding Defendant further responds as follows:

- a. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.
- b. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations

constitute a conclusion of law to which no response is required.

c. The allegations set forth in this paragraph are not directed to Responding Defendant and therefore they are neither admitted nor denied. Moreover, Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs. Additionally, the allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

d. Denied.

e. Denied.

140. Denied.

141. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

WHEREFORE, Responding Defendant, Clear Edge Title Inc., demands judgment:

- a) Dismissing the Complaint with prejudice;
- b) For court costs; and
- c) Such other relief as the Court deems appropriate.

**COUNT 4** (All Defendants)

**NEW JERSEY TRUTH IN CONSUMER CONTRACT WARRANTY AND NOTICE ACT**

142. Responding Defendant repeats and realleges the responses to the allegations set forth in the previous paragraphs as if set forth in full.

143. Denied. By way of further response, Responding Defendant specifically denies that it has violated any statute, including but not limited to the New Jersey Truth in Consumer Contract Warranty and Notice Act. Moreover, the allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Finally, the allegations constitute a conclusion of law to which no response is required.

144. Denied. By way of further response, Responding Defendant specifically denies that it has violated any statute, including but not limited to the New Jersey Truth in Consumer Contract Warranty and Notice Act. Moreover, the allegations raised in this paragraph reference a Statute the terms of which speak for themselves and to the extent the Statute is mischaracterized the allegations are denied. Additionally, the allegations constitute



a conclusion of law to which no response is required. Finally, Responding Defendant does not have sufficient knowledge to either admit or deny the remaining allegations in this paragraph and therefore leaves Plaintiff to her proofs.

145. Denied.

146. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

**WHEREFORE**, Responding Defendant, Clear Edge Title Inc., demands judgment:

- a) Dismissing the Complaint with prejudice;
- b) For court costs; and
- c) Such other relief as the Court deems appropriate.

**COUNT 5** (Clear Edge Title Inc.)  
**AIDING AND ABETTING**

147. Responding Defendant repeats and realleges the responses to the allegations set forth in the previous paragraphs as if set forth in full.

148. Admitted in part, denied in part. By way of further response, it is admitted only that Responding Defendant performed the services of a title agent. All of the remaining allegations, and the mischaracterization of Responding Defendant's services, set forth in this paragraph are specifically denied and Plaintiff is left to her proofs.

149. Denied. By way of further response, all of the allegations raised in this paragraph, and the mischaracterization of same, are specifically denied and Plaintiff is left to her proofs.

150. Responding Defendant does not have sufficient knowledge to either admit or deny the allegations in this paragraph and therefore leaves Plaintiff to her proofs.

**WHEREFORE**, Responding Defendant, Clear Edge Title Inc., demands judgment:

- a) Dismissing the Complaint with prejudice;
- b) For court costs; and
- c) Such other relief as the Court deems appropriate.

**AFFIRMATIVE DEFENSES**

1. The Complaint fails to state a claim upon which relief can be granted.

2. The claims set forth in the Complaint are barred by the applicable Statute of Limitations or Repose.

3. The Court lacks jurisdiction over the subject matter.

4. The Court lacks jurisdiction over the person of the defendant.

5. There has been an insufficiency of service of process.

6. The Complaint is barred by the principles of res judicata, collateral estoppel and/or the Entire Controversy Doctrine.

7. Any and all injuries and damages sustained by plaintiff were the result of the acts or omissions of third parties over whom this defendant had no control.

8. Recovery on the claim set forth in the Complaint is diminished or barred by the failure of the injured plaintiff to mitigate damages.

9. Recovery on the claim set forth in the Complaint is diminished or barred by the negligence of the injured plaintiff pursuant to the Comparative Negligence Act.

10. The incident complained of was the result of conditions and circumstances over which this defendant had no control.

11. The conduct complained of was in good faith, privileged and with reasonable cause and justification.

12. Recovery is barred by plaintiff's unreasonable and voluntary exposure to a known risk.

13. Plaintiff's Complaint is barred because of the inapplicability of joint and several liability.

14. Defendant hereby claims the benefit of each and every separate defense alleged by any and all defendants and third-party defendants named now or in the future.

15. Plaintiff's complaint is barred by a failure to comply with N.J.S.A. 2A:53A-26 et seq.

16. Plaintiff's complaint is barred or diminished by the Doctrines of Set Off and Recoupment.

17. Plaintiff's complaint is barred or diminished by the Doctrine of Economic Loss.

**CROSSCLAIM FOR CONTRIBUTION & INDEMNIFICATION**

1. Defendant, Clear Edge Title Inc., hereby demands contribution and indemnification statutory, contractual or common law from Defendant, Unlock Partnership Solutions AOI Inc., and any and all other co-defendants and/or third-party defendants hereafter named by any party.

**JURY DEMAND**

Responding Defendant, Clear Edge Title Inc., pursuant to Rule 4:35-1 demands a trial by jury of any issue triable of right by a jury.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:25 4, Stephen McNally and Paige M. Bellino, Esquire are designated as trial counsel on behalf of Defendant, Clear Edge Title Inc., in the above matter.

**CERTIFICATION OF FILING AND SERVICE**

I hereby certify that the within pleading was filed and served within the time limits provided by the Rules of Court.

**CERTIFICATION PURSUANT TO F.R.C.P. 5.2**

I hereby certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with F.R.C.P. 5.2.

**MCNALLY & BELLINO, LLC**

*Attorneys for Defendant, CETI*

Dated: 4/9/2025

By: /s/ Paige M. Bellino

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